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Attorneys for Defendants
 COUNTY OF SANTA CLARA
 DEPARTMENT OF CORRECTION,
 GARRETT ZOMPOLIS, THOMAS
 DURAN, JOSE DAVID VILLAGOMEZ,
 and DAN WOODS

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

STEPHEN C. LEAL,

Plaintiff,

v.

OFFICER K. SIEGEL, an individual;
 SAN JOSE POLICE DEPARTMENT;
 CITY OF SAN JOSE; SANTA CLARA
 COUNTY DEPARTMENT OF
 CORRECTIONS; AND DOES 1 through
 10, inclusive,

Defendants.

No. C05-00959 JW

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO EXTEND DEADLINE FOR EXPERT
 DISCLOSURE**

(Fed. Rules Civ. Proc. 26(a)(2) & 29)

All parties hereby stipulate and request an order that the deadline for disclosure of expert witnesses be extended to sixty days before the trial setting conference, which is currently set for November 27, 2006. The disclosure of expert witnesses would therefore be due on or before September 27, 2006. Because of unforeseen delays in medical discovery, the current date for expert witness disclosure, June 29, 2006, will be difficult if not impossible for the County to comply with. This stipulation and order would not affect any discovery deadlines or trial setting of this matter.

Pursuant to Federal Rules of Civil Procedure 26(a)(2) and 29, this Stipulation and

[Proposed] Order to Extend Time for Expert Disclosure is based on this Application and the Affidavit of Michael L. Rossi in Support of the motion.

Dated: June 16, 2006

Respectfully submitted,

ANN MILLER RAVEL
County Counsel

By:



MICHAEL L. ROSSI
Deputy County Counsel

Attorneys for Defendants
COUNTY OF SANTA CLARA
DEPARTMENT OF CORRECTION,
GARRETT ZOMPOLIS, THOMAS
DURAN, JOSE DAVID
VILLAGOMEZ, and DAN WOODS

IT IS SO STIPULATED.

Dated: June __, 2006

LOUIS P. DELL, ESQ.
Attorney for Plaintiff STEPHEN C.
LEAL

Dated: June __, 2006

SEAN G. ERENSTOFT, ESQ.
Attorney for Plaintiff STEPHEN C.
LEAL

Dated: June __, 2006

CLIFF S. GREENBERG
Senior Deputy City Attorney
Attorney for Defendants CITY OF
SAN JOSE and OFFICER K.
SIEGEL

IT IS SO ORDERED.

Dated: June __, 2006

THE HONORABLE JAMES WARE
United States District Court Judge

44236.wpd

1 [Proposed] Order to Extend Time for Expert Disclosure is based on this Application and the
2 Affidavit of Michael L. Rossi in Support of the motion.

3 Dated: June __, 2006

Respectfully submitted,

ANN MILLER RAVEL
County Counsel

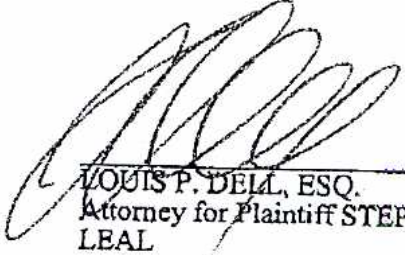
By:

MICHAEL L. ROSSI
Deputy County Counsel

Attorneys for Defendants
COUNTY OF SANTA CLARA
DEPARTMENT OF CORRECTION,
GARRETT ZOMPOLIS, THOMAS
DURAN, JOSE DAVID
VILLAGOMEZ, and DAN WOODS

12 IT IS SO STIPULATED.

14 Dated: June 14, 2006


LOUIS P. DELL, ESQ.
Attorney for Plaintiff STEPHEN C.
LEAL

17 Dated: June __, 2006

SEAN G. ERENSTOFT, ESQ.
Attorney for Plaintiff STEPHEN C.
LEAL

20 Dated: June __, 2006

CLIFF S. GREENBERG
Senior Deputy City Attorney
Attorney for Defendants CITY OF
SAN JOSE and OFFICER K.
SIEGEL

24 IT IS SO ORDERED.

25 Dated: June __, 2006

THE HONORABLE JAMES WARE
United States District Court Judge

28 44236.wpd

1 [Proposed] Order to Extend Time for Expert Disclosure is based on this Application and the
2 Affidavit of Michael L. Rossi in Support of the motion.

3 Dated: June __, 2006

Respectfully submitted,

4 ANN MILLER RAVEL
5 County Counsel

6 By:

7 MICHAEL L. ROSSI
8 Deputy County Counsel

9 Attorneys for Defendants
10 COUNTY OF SANTA CLARA
11 DEPARTMENT OF CORRECTION,
12 GARRETT ZOMPOLIS, THOMAS
13 DURAN, JOSE DAVID
14 VILLAGOMEZ, and DAN WOODS

12 IT IS SO STIPULATED.

14 Dated: June __, 2006

15 LOUIS P. DELL, ESQ.
16 Attorney for Plaintiff STEPHEN C.
17 LEAL

17 Dated: June __, 2006

18 SEAN G. ERENSTOFT, ESQ.
19 Attorney for Plaintiff STEPHEN C.
20 LEAL

20 Dated: June 15, 2006

21 CLIFF S. GREENBERG
22 Senior Deputy City Attorney
23 Attorney for Defendants CITY OF
24 SAN JOSE and OFFICER K.
25 SIEGEL

23 IT IS SO ORDERED.

25 Dated: June 27, 2006

26 THE HONORABLE JAMES WARE
27 United States District Court Judge

28 44236.wpd

ANN MILLER RAVEL
County Counsel
County of Santa Clara
San Jose, California

Stipulation and [Proposed] Order to
Extend Deadline for Expert Disclosure